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March 25, 2021

VIA ECF

The Honorable Lorna G. Schofield United States Courthouse 500 Pearl Street New York, New York 10007

Re: Ramirez v. Group Short Term Disability, Long Term Disability and Life Plan for Employees of ZB Company, Inc., et al. Case No.: 20-cv-09624 (LGS)

Dear Judge Schofield:

The undersigned represents plaintiff Glenda Ramirez in the above-referenced ERISA disability action. Further to Your Honor's order of March 12 (Docket No. 23), I write to report that the parties have worked diligently to redact plaintiff's personal information from the 1,826 pages of which the administrative record is comprised. At present, however, the parties are in need of guidance in terms of how to deal with plaintiff's protected health information, with which the administrative record is replete. Not wanting to run afoul of the order of March 12, we respectfully request an opportunity to briefly conference the issue with one of your law clerks, and, pending that conference, a brief adjournment of tomorrow's deadline.

The administrative records contains many references to Plaintiff's personal information and PHI for which sealing is appropriate, but also contains general information about the benefits plans at issue in this case, as well as correspondence regarding Plaintiff's claims for which sealing is not appropriate. Pursuant to the Court's March 12, 2021, Order at Docket No. 23, the parties shall file the administrative record with proposed redactions. The parties shall redact any PHI in the record. Where appropriate (e.g., medical records), the parties may redact pages in their entirety. The parties' deadline to file the redacted administrative record is extended to April 2, 2021.

Respectfully submitted,

LAW OFFICE OF CHRISTOPHER P. FOLEY, LLC

Christopher P. Foley

The Clerk of Court is respectfully directed to close the motion at Docket No. 27.

So Ordered.

Dated: March 26, 2021 New York, New York LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE